**UNITED STATES DISTRICT COURT**
**EASTERN DISTRICT OF NEW YORK**

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| **HILLARY SMALLWOOD,**<br><br>                    **Plaintiff,**<br><br>     **-against-**<br><br>**DELTA AIR LINES, INC.,**<br><br>                    **Defendant.** | **Civil Action No. 1:18-cv-03543** |

| DISCOVERY PLAN WORKSHEET | |
|---|---|
| **Phase I (Pre-Settlement Discovery)** | |
| **Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:** | October 28, 2018 |
| **Completion date for Phase I Discovery as agreed upon by the parties:** *(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)* | December 11, 2018 |
| **Date for initial settlement conference:** *(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)* | January 8, 2019 |
| **Phase II (Discovery and Motion Practice)** | |
| **Motion to join new parties or amend the pleadings:** *(Presumptively 15 days post initial settlement conference)* | January 18, 2019 |
| **First requests for production of documents and for interrogatories due by:** *(Presumptively 15 days post joining/amending)* | February 4, 2019 |
| **All fact discovery completed by:** *(Presumptively 3.5 months post first requests for documents/interrogatories)* | May 10, 2019 |
| **Exchange of expert reports completed by:** *(Presumptively 30 days post fact discovery)* | June 7, 2019 |
| **Expert depositions completed by:** *(Presumptively 30 days post expert reports)* | July 5, 2019 |
| **COMPLETION OF ALL DISCOVERY BY:** *(Presumptively 9 months after Initial Conference)* | ==July 12, 2019== |
| **Final date to take first step in dispositive motion practice:** *(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)* | August 12, 2019 |
| **Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?** | No |